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July 24, 2023

Hon. John Cronan  
U.S. District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Zhang*, 23-cr-00366

Your Honor:

I am counsel of record for the above-referenced Defendant.

My client appeared before Your Honor on August 20, 2023, and entered a plea of Guilty in full satisfaction of all charges.

By this letter I am requesting that Mr. Zhang, who is out on bail, be permitted to travel to Maine from August 4<sup>th</sup> through August 6<sup>th</sup>, for a holiday with his daughter.

I have been in touch with his Pre-Trial Services Officer, Jazzlyn Harris, and she has informed me that she has no objection to this request. Further, during my client's Plea proceeding, the Government stated that they had no objection, as long as Pre-Trial Services did not object.

Your prompt attention to this request is greatly appreciated as, if granted, he needs to make necessary arrangement as soon as possible.

Respectfully submitted,

Defendant's unopposed request to travel to Maine from August 4 through August 6, 2023 is granted. The conditions of Defendant's bail are modified to permit him to travel to the District of Maine from August 4, 2023 through August 6, 2023 with the permission of Pre-Trial Services and provided that he provides Pre-Trial Services with a copy of his travel itinerary.

/s/ Bernard V. Kleinman  
Bernard V. Kleinman, Esq.  
Attorney for Defendant ZHANG

SO ORDERED.

July 24, 2023  
New York, New York



JOHN P. CRONAN  
United States District Judge